

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

JOHN BULTHOUSE Individually and as
Personal Representative for the Estate of
Paul Bulthouse, Deceased,

PLAINTIFF,

-vs-

Case No.: 1:21-cv-00281
Hon. Paul L. Maloney

COUNTY OF MUSKEGON, a municipal corporation, et. al.

DEFENDANTS.

The Marcel S. Benavides Law Office
Marcel S. Benavides (P69562)
Attorney for Plaintiff
801 West Eleven Mile Rd., Ste. 130
Royal Oak, MI 48067
(248) 549-8555
benavideslaw@att.net

Foley, Baron, Metzger & Juip PLLC
Brian J. Richtarcik (P49390)
Randall A. Juip (P58538)
Attorneys for Defendants, Wellpath, LLC,
Joseph Natole, M.D., Carleen Blanche, RN,
Jessica Fairbanks, LPN, Ashleigh Severance,
LPN, Aubrey Schotts, RN, Richele Marion,
EMT, Danielle Carlson, LPN, Britni
Brinkman, EMT and David Lopez, LPN,
only
38777 Six Mile Rd., Ste. 300
Livonia, MI 48152
(734) 742-1800
brichtarcik@fbmjlaw.com
rajuip@fbmjlaw.com

**STIPULATION AND ORDER EXTENDING TIME TO ANSWER
THE COMPLAINT AND FILE AFFIDAVITS OF MERITORIOUS DEFENSE**

Defendants, WELLPATH, LLC, JOSEPH NATOLE, M.D., CARLEEN BLANCHE, RN, JESSICA FAIRBANKS, LPN, ASHLEIGH SEVERANCE, LPN, AUBREY SCHOTTS, RN, RICHELE MARION, EMT, DANIELLE CARLSON, LPN, BRITNI BRINKMAN, EMT and DAVID LOPEZ, LPN, only, voluntarily accepted service of the Complaint (filed 3/29/2021) and filed appearances in this matter by their attorneys, FOLEY, BARON, METZGER & JUIP, PLLC, on 4/29/2021. Therefore Plaintiff's counsel has agreed to stipulate to extend the time for these defendants to answer the complaint 63 days from the date of the above referenced

appearances. Further Plaintiff's counsel agrees to extend the time for these defendants to file Affidavits of Meritorious Defense required by MCL 600.2912e to be due 91 days after these defendants file their answer to the Complaint.

THEREFORE, defendants Answer to the Complaint by WELLPATH, LLC, JOSEPH NATOLE, M.D., CARLEEN BLANCHE, RN, JESSICA FAIRBANKS, LPN, ASHLEIGH SEVERANCE, LPN, AUBREY SCHOTTS, RN, RICHELE MARION, EMT, DANIELLE CARLSON, LPN, BRITNI BRINKMAN, EMT and DAVID LOPEZ, LPN, only, shall be due filed on or before 7/6/2021, and their affidavit of Meritorious Defense pursuant to MCL 600.2912e shall be due filed on or before 91 days after Defendants file their Answer.

Date: May 6, 2021

/s/ Paul L. Maloney
United States District Judge

I stipulate to entry of the above order as to form and substance:

/s/Marcel S. Benavides with consent
Marcel S. Benavides (P69562)
Attorneys for Plaintiff

/s/Brian J. Richtarcik
Brian J. Richtarcik (P49390)
Attorneys for Defendants, Wellpath, LLC,
Joseph Natole, M.D., Carleen Blanche, RN,
Jessica Fairbanks, LPN, Ashleigh
Severance, LPN, Aubrey Schotts, RN,
Richele Marion, EMT, Danielle Carlson,
LPN, Britni Brinkman, EMT and David
Lopez, LPN, only

Prepared by:

/s/Brian J. Richtarcik
BRIAN J. RICHTARCIK (P49390)